

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

YOUNG MIN LEE, individually and on behalf of all  
employees similarly situated,

Plaintiff,

- against -

NEW KANG SUH INC. d/b/a Korea Garden and MYUNG  
SOOK CHOI

Defendants.

Case No. 7:17-cv-09502-NSR

**DECLARATION OF  
YONGJIN BAE IN SUPPORT  
OF MOTION FOR AN  
AWARD OF ATTORNEYS'  
FEES AND COSTS**

**DECLARATION OF YONGJIN BAE**

I, Yongjin Bae, an attorney duly admitted to practice law in the Southern District of New York, hereby declare as follows:

1. I submit this Declaration in support of Plaintiffs' Application for Attorneys' Fees and Costs.
2. The Hang & Associates attorneys, law clerks, and paralegals who worked on this action and are referenced in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for an Award of Attorneys' Fees and Costs are as follows:

|                  | Number of hours worked | Hourly rate |
|------------------|------------------------|-------------|
| <b>Attorneys</b> |                        |             |
| Jian Hang        | 3.40 hrs               | \$350       |
| Philip Kim       | 21.20 hrs              | \$250       |
| Ken H. Maeng     | 63.00 hrs              | \$300       |
| Diana Seo        | 83.90 hrs              | \$300       |
| Yongjin Bae      | 100.40 hrs             | \$300       |
| Shan Zhu         | 7.10 hrs               | \$300       |
| Ziyi Gao         | 11.00 hrs              | \$300       |
| Yuezhu Liu       | 4.70 hrs               | \$300       |
| Ge Qu            | 3.60 hrs               | \$300       |
| Zhangyuxi Wang   | 0.50 hrs               | \$300       |

|                      |                   |                    |
|----------------------|-------------------|--------------------|
| Jie Shi              | 0.10 hrs          | \$300              |
| Jiajing Fan          | 0.20 hrs          | \$300              |
| Zindzi Baugh Corbett | 0.20 hrs          | \$300              |
| <b>Paralegals</b>    |                   |                    |
| Maritza Yanes        | 4.10 hrs          | \$150              |
| Ge Yan               | 4.10 hrs          | \$150              |
| <b>Total</b>         | <b>308.00 hrs</b> | <b>\$89,720.00</b> |

3. Hang & Associates, PLLC (“Hang & Associates”) represents both plaintiffs and defendants in litigating claims arising out of the employment relationship, including claims for employment discrimination, wage and hour issues, and contract disputes. Jian Hang, Esq., principal attorney of Hang & Associates, has over ten years of experience in the field of employment law. His office currently represents plaintiffs with wage & hour claims in more than 100 lawsuits in federal and state courts and is well respected in the Flushing community. Prior to forming Hang & Associates Mr. Hang practiced labor law at Epstein, Becker & Green, P.C. Hang & Associates focuses exclusively on employment law. Given his years of experience, and the practice’s specialized focus on employment law, Jian Hang typically charges an hourly rate of \$350.
4. Mr. Phillip H. Kim, Esq., a former associate at Hang & Associates, earned his law degree from Brooklyn Law School and completed his undergraduate studies at Colgate University. As a law student, he served as Associate Research Editor for the Journal of Law & Policy. Upon his graduation, Mr. Kim held a judicial fellowship position under a Judge in the New York State Supreme Court, where he gained valuable legal writing experience prior to joining Hang & Associates. Mr. Kim had a diverse background in civil litigation including labor and employment litigation. At Hang & Associates, Mr. Hang successfully litigated numerous labor and employment law cases on both

plaintiffs' and defendants' sides, including matters involving the FLSA, NYLL, and ADA. Mr. Kim billed an hourly rate of \$250 per hour.

5. Mr. Ken H. Maeng, Esq., a former associate at Hang & Associates, had experience in a wide variety of labor matters. He graduated with a Juris Doctorate from Brooklyn Law School in 2016 and joined Hang & Associates in 2018. Being fluent in Korean, he specialized in representing the Korean community in these cases both on plaintiff's and defendant's side. Prior to joining Hang & Associates, Mr. Maeng worked for a boutique employment law firm in New Jersey where he successfully litigated numerous employment law cases on Defendant's side, including matters involving the FLSA and NYLL. Before Mr. Maeng left the firm, he independently handled a case load of 30+ cases which included client intake, discovery, depositions, motion practice, settlement and possible trial. Given his extensive experience, Hang Law billed his hourly rate at \$300. See *Ross v. Lake Norman Enters., LLC*, No. 1:17-cv-06332-RRM-RER, 2019 U.S. Dist. LEXIS 68156 (E.D.N.Y. Apr. 19, 2019); *Teow et al v. 66S Fusion, Inc. et al.*, No. 1:18-cv-05268-RLM, Dkt (17 – 20). He is licensed to practice in New York and New Jersey and is admitted to the United States District Court for the District of New Jersey and the Northern, Eastern, and Southern Districts of New York.
6. Diana Seo, Esq., a former associate at Hang & Associates, began practicing employment and labor law in 2019 when she joined Hang & Associates. She received her J.D. Degree in 2014 and is admitted to practice law in both Arizona and New York. From 2015 to mid-2016, She worked as an associate attorney at MK Law Group and handled various family based and business immigration cases. She also handled many high-end substantive legal work including drafting and negotiating commercial contract, joining

deal terms and investigating terms, and advising on regulatory compliance matters relating to the states she is licensed in. Prior to joining Hang & Associate, she provided legal representation and assisted handling various family, civil and criminal cases at Law Offices of Stephen A. Shikes, Esq., and at Law Offices of Dennis Chang, P.C. Hang Law billed Ms. Seo at an hourly rate of \$300.

7. I, Yongjin Bae, Esq., has been practicing employment and labor law since joining Hang & Associates, in 2021. I received my J.D. Degree in 2016 from University of Minnesota Law School and I am duly licensed and admitted to practice law in both New York and New Jersey. From 2016 to 2017, I worked at Law Offices of Young Soo Choi, P.C. and handled various family based and business immigration cases. I also handled many high-end substantive legal work including drafting and negotiating commercial contract, and real estate transactions. Prior to joining Hang & Associate, I provided legal representation and also assisted handling various family, civil and criminal cases at Law Offices of Jin Han, P.C. Hang Law currently bills his hourly bill of \$300.
8. Shan Zhu, Esq., a former associate at Hang & Associates, joined Hang & Associates in 2019. Before he joined Hang & Associates, he worked for a boutique employment law firm in New Jersey since 2018 where he acquired experience litigating FLSA matters representing both employees and employers. He also represented clients in complex commercial litigations. He received a Juris Doctor degree from Case Western Reserve University School of Law in January 2018; and an LLM from the same law school. Hang Law currently bills his hourly bill of \$300.
9. Ge Qu, Esq. has substantial experience litigating FLSA matters from pleading to trial representing both employees and employers. In addition to FLSA cases, He has litigated

employment matters arising under Title VII, Family Medical Leave Act, and Equal Pay Act. He dedicated the majority of his time to FLSA matters including more than 20 cases in this District alone. In addition, he represents employees as well as employers before federal and state agencies such as the National Labor Relations Board, Equal Employment Opportunity Commission, and New York State Human Rights Division. For instance, he has successfully represented an employer from a retaliation charge filed with NLRB in connection, resulting in dismissal. He also represents commercial tenants in actions arising under Title III of the American with Disabilities Act. Hang Law has routinely billed his service to clients, including FLSA matters, at \$300 per hour. He received a Juris Doctor degree from Fordham University School of Law in 2015; and an advanced LLM in Law & Entrepreneurship degree from Duke University School of Law. Hang Law currently bills his hourly bill of \$300.

10. Yuezhu Liu, Esq. is the senior associate at the law firm of Hang & Associates, PLLC.

She graduated from University of Maryland Francis King Carey School of Law and has practiced wage and hour law for approximately three years, and has handled over 30 FLSA cases in the SDNY and EDNY. Hang Law bills Ms. Liu at an hourly rate of \$300.

11. Ms. Ziyi Gao is an associate attorney of H&A who worked on this case. Ms. Gao received her J.D. degree from Touro College Jacob D. Fuchsberg Law Center with the honor of Magna Cum Laude in 2021 and was recently admitted to both Eastern and Southern District Court of New York in May 2022. Since her joining the firm in November 2021, Ms. Gao has focused her practice on employment litigation, representing both plaintiffs and defendants in FLSA matters. Ms. Gao have actively litigated over 40 cases in all stages of the litigation, from pleading, motion practice,

discovery, and trial. H&A routinely bills her service at an hourly rate of \$300 per hour.

12. Zhangyuxi Wang, Esq is duly licensed and admitted to practice law in both New York and California State, moreover, she has experience in civil litigation and a wide variety of labor matters, including litigation of wage and hour, discrimination, and retaliation claims in state and federal courts. Being fluent in mandarin, she specializes in representing the Chinese community in these cases both on the plaintiff's and defendant's side. Currently, she independently handles cases which include client intake, discovery, depositions, motion practice, settlement, and possible trial, and bill an hourly rate of \$300.
13. Ms. Zindzi Baugh Corbett, Esq. received her law degree from Norman Manley Law School in Jamaica in 2015 and was admitted to practice in New York State in 2019. Ms. Corbett specializes in representing the Spanish-speaking community in cases both on plaintiff and defendant side. Additionally, as the only Spanish-speaking attorney at the firm, she assists other associates with corresponding with clients, conducting meetings, drafting documents and also court attendances. Before Ms. Corbett joined Hang Law, she had litigation assistance experience as an Electronic Filing Clerk at litigation company in New York City, she also volunteered as a Child Advocate on behalf of unaccompanied immigrant minors. This Court has approved her attorney fees at \$300/hour. See e.g. *Mendoza v. S & F Supplies, Inc., et al.*, case No. 1:19-cv-01538. (E.D.N.Y. Feb. 28, 2020). Hang Law billed his hourly bill of \$300.
14. Jiajing Fan, Esq., a former associate at Hang & Associates, had been practicing in employment and labor laws since September 2018. She received LLM-Legal Institutions Degree from the University of Wisconsin Madison Law School in 2016. Before she

joined Hang & Associates, she had litigation assistance experience in housing laws litigations in Legal Actions of Wisconsin from December 2017 to May 2018. Since September 2018, she had substantial experience litigating FLSA matters from pleading to trial representing both employees and employers. She had dedicated the majority of her time to FLSA matters including more than 30 cases in this District alone. In addition to FLSA cases, she litigated employment matters arising under Title VII. In addition, she represents employers before federal and state agencies such as the National Labor Relations Board, Equal Employment Opportunity Commission, and New York State Human Rights Division, and Occupational Safety and Health Administration (OSHA). Hang Law billed her service to clients since January 2019, including FLSA matters, at \$300 per hour.

15. Ms. Shi is an associate attorney at Hang & Associates, PLLC. In this role, she is responsible for drafting and preparing court filings for employment litigations, especially wage and hour lawsuits involving minimum wages, breaks, or overtime issues. Prior to joining Hang & Associates, Ms. Shi received her Juris Doctor from Vanderbilt Law School with a Law and Business Certificate. Hang Law currently bills her hourly bill of \$300.
16. Ms. Ge Yan worked as a law clerk in Hang & Associates and had experiences in doing intake, background research, conduct legal research, conduct translation and draft internal memos. Ms. Yan received her LL.M. Degree from the Washington University School of Law in 2019 and joined Hang & Associates the same year. Up to now, Ms. Yan has passed the Chinese National Bar Exam. As a Chinese speaker, Ms. Yan facilitate the communication between clients and the attorneys in the law firm. She

currently has an hourly bill for \$150.

17. Ms. Maritza Yanes is a bilingual paralegal at Hang & Associates, PLLC with a wide range of customer service experience. Ms. Maritza has worked with Spanish-speaking clients supporting them in communications, document drafting and preparation, translations, mathematics calculations, statistics reports, and other clerical functions. Ms. Yanes has taken Accounting and Computer classes that helps her to provide damage calculations with efficiency and accuracy. As a Spanish speaker, Ms. Yanes helps the firm's Hispanic clients understand their case through their attorney. Hang Law currently bills Ms. Yanes at an hourly rate of \$150.

18. The billing records of Hang & Associates attorneys, and law clerks are annexed as **Exhibit**

A. Using the above rates, Hang & Associates attorneys' fees are calculated as \$48,960.00.

19. Plaintiffs also seek an award of costs for an amount of \$3,837.23. Plaintiffs' records of costs are annexed as **Exhibit B**.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated:     Flushing, New York  
          October 28, 2020

/s/ Yongjin Bae  
Yongjin Bae, Esq.